

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

KAREN TLATEMPA,)	
Administrator for the Estate)	
of Eduardo Tlatempa, Deceased,)	
)	
Plaintiff,)	1:14cv400 (JCC/TCB)
)	
v.)	
)	
John Bean Technologies Corporation.)	
et al.,)	
)	
Defendants)	

PLAINTIFF'S LIST OF WITNESSES AND EXHIBITS

PLAINTIFF KAREN TLATEMPA, by counsel, and pursuant to F.R.Civ.P. 26, L and the Order of this Court dated May 1, 2014, hereby files her List of Witnesses, List of Exhibits, Written Stipulation of Facts, and Rule 26 (a)(3) disclosures.

Respectfully submitted,

KAREN TLATEMPA, AS
ADMINISTRATOR OF THE ESTATE OF
EDUARDO TLATEMPA, DECEASED,
PLAINTIFF

By Counsel

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And

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of August, 2014, I electronically filed the foregoing with the Clerk of Court and served all counsel of record herein by using the CM/ECF system.

/S/KENNETH WARREN SMITH
KENNETH WARREN SMITH

PLAINTIFF'S LIST OF WITNESSES

A. Witnesses Expected to be Called to Testify at Trial:

1. Cpl K. Bucy, MWAA, Dulles, VA
2. Kimberly Allen, MWAA-EMS, Dulles, VA
3. Todd Bevans, MWAA-EMS, Dulles, VA
4. Johnny Prodromo, 43853 Delightful Place, Ashburn, VA 20147, (571) 235-3407
5. James Greathouse, United Airlines employee, Dulles, VA
9749 Westwood Rd, Catlett, VA 20119, (571) 247-6774
6. Doug Richter, United Airlines employee, Dulles, VA
7. Roger Goddard, United Airlines employee, Dulles, VA
8. Billy Hoover, United Airlines employee, Dulles, VA
9. Mario Jimenez, United Airlines employee, Dulles, VA
10. Steve Smith, United Airlines employee, Dulles, VA,
14 Heron Ct., Charles Town, WV 25414, (571) 501-6752
1. Eric Davis, JBT, Orlando, FL
2. Nicolaas Heemskerk, JBT Orlando, FL
3. Sharon R Chittenden, D.O., Assistant Chief Medical Examiner, Com. Va.
4. Joanne Whitlock, Reviewing Medicolegal Death Investigator, Com. Va.
5. Peter Leiss, P.E., Robson Forensic, Inc. 354 North Prince St Lancaster,
PA 17603, [717.286.9319](tel:717.286.9319)
6. Nancy Grugle, Ph.D., Robson Forensic, Inc., Denver, CO [303-388-0372](tel:303-388-0372)

7. Lurito, Richard PhD, R L Inc, 1491 Chain Bridge Road # 202, Mc Lean,
VA 22101
8. Karen Tlatempa
9. Yvette Tlatempa

B. Witnesses who are expected to testify via deposition:

1. Eric Davis, JBT, Orlando, FL
2. Nikolaas Heemskerk, Orlando, FL

C. Witnesses who may be called if the need arises:

1. Jim Tallant, Swissport, Dulles
2. Andrew Alexander, United Airlines, Dulles
3. Gregory Pinelli, United Airlines, Dulles
4. Jheron Bacosa
5. Mazin Hallaj, MD, Reston Hospital Center
6. Margaret Griffen, MD, Inova Fairfax Hospital
7. Kathy Katusha, MD, (Death Certificate), 8503 Arlington Blvd Ste 140,
Fairfax, Virginia 22031-4629, (703) 876-9300
8. Andre Hackett, United Airlines employee
9. Jon Stanton, United Airlines employee
10. George Lamay, MWAA, Dulles, VA
11. MWAA Custodian of Records, Dulles, VA
12. Reston Hospital Custodian of Records

13. Inova Fairfax Hospital Custodian of Records
14. United Airlines Custodian of Records for Dulles
15. Custodian of Records for McLaughlin Funeral Home
16. Eduardo Tlatempa Aquino, Sur 24 numero 362 col agridola oriental.

Delegacion iztacalco CP08 500 Mexico DF

17. Gloria Tlatampa Lopez, Sur 24 numero 362 col agridola oriental.

Delegacion iztacalco CP08 500 Mexico DF

PLAINTIFF'S LIST OF EXHIBITS

1. MWAA Death Report
2. MWAA Photograph of Scene
3. MWAA Photograph of Scene
4. MWAA Photograph of Scene
5. MWAA Photograph of Scene
6. MWAA Photograph of Scene
7. MWAA Photograph of Scene
8. Virginia Department of Labor and Industry, Occupational Safety and Health Compliance, Citation and Notification of Penalty
9. Virginia DOLI Video DSCF0037.avi
10. Virginia DOLI Video DSCF0053.avi
11. Virginia DOLI photo DSCF0035.jpg
12. Virginia DOLI photo DSCF0036.jpg
13. Virginia DOLI photo DSCF0037.jpg

14. Virginia DOLI photo DSCF0038.jpg
15. Virginia DOLI photo DSCF0039.jpg
16. Virginia DOLI photo DSCF0040.jpg
17. Virginia DOLI photo DSCF0041.jpg
18. Virginia DOLI photo DSCF0042.jpg
19. Virginia DOLI photo DSCF0043.jpg
20. Virginia DOLI photo DSCF0044.jpg
21. Virginia DOLI photo DSCF0045.jpg
22. Virginia DOLI photo DSCF0047.jpg
23. Virginia DOLI photo DSCF0048.jpg
24. Virginia DOLI photo DSCF0049.jpg
25. Virginia DOLI photo DSCF0050.jpg
26. Virginia DOLI photo DSCF0051.jpg
27. Virginia DOLI photo DSCF0052.jpg
28. Virginia DOLI photo DSCF0053.jpg
29. United Airlines Accident Report for April 24, 2010 Incident
30. Selected portions of 30(b)(6) deposition of Eric Davis
31. Eric Davis email 4/5/2011
32. Gregory Pinelli email 4/4/2011
33. Photograph of Boeing 777
34. Photograph of cargo bay door
35. Photograph of cargo bay locks

36. Photograph of cargo bay locks
37. Photograph of CL218
38. Photograph of raised folding wing from side
39. Photograph of locking pin and spring
40. Photograph of handle
41. Photograph of decal
42. Photograph of decals
43. Photograph of decal
44. Photograph of decal
45. Photograph of decal
46. Photograph of bracket and measuring tape
47. Photograph of bracket and measuring tape
48. Photograph of locking pin and measuring tape
49. Photograph of locking pin and measuring tape
50. Photograph of rear of loader

51. Photograph of powered rollers
52. Photograph of cargo bins or “cans”
53. Andrew Alexander email 4/20/2011
54. Eric Davis email 4/8/2011
55. Jason Yenor email 4/2/2011
56. Selected portions of 30(b)(6) deposition of Nnicolaas Heemskerk
57. Uniteddair0000095
58. Product Safety Committee Meeting 1/26/2011 (JBT003316)
59. Product Safety Committee Meeting 2/23/2011 (JBT003317)
60. Product Safety Committee Meeting 3/9/2011 (JBT003318)
61. Heemskerk email 9/21/26 (JBT003319)
62. FMC Commander Commander 15i Technical Bulletin #10 - Manual Wing
Locking Pin Improvement (JBT003319)
63. Heemskerk email 9/21/2006 (JBT003327- JBT003328)
64. Heemskerk email 9/21/2006 (JBT003329- JBT003331)
65. Meeting Minutes 104” Wing, Powered vs. Non-Powered Roller Feb. 3,
2003 (JBT003335- JBT003337)
66. JBT Commander 15i Hazard Analysis 3/19/2014 (JBT004170-
JBT004183)
67. Excerpts Commander 15 Operating Manual Jan 1995
68. Photograph
69. Photograph

70. Photograph
71. Photograph
72. Photograph
73. Photograph
74. Photograph
75. Photograph
76. Photograph
77. Photograph
78. Certificate of Naturalization
79. Medical Examiner Report
80. Death Certificate
81. Certificate/Letter of Qualification
82. Summary of Medical and Other Pecuniary Losses
83. Airports Authority Emergency Medical Services bill
84. Reston Hospital Center bill
85. Fairfax Radiological Consultants bill
86. Inova Fairfax Hospital bill
87. McLaughlin Funeral Home bill1
88. MWAA Pre-Hospital Care Report
89. Reston Hospital Center Medical Records
90. Inova Fairfax Hospital selected medical records
91. State of New Jersey Child Support

- 92. Poems by Karen Tlatempa
- 93. Photo of Eduardo Tlatempa in hospital
- 94. Inova Fairfax Hospital bill